

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**FELONY**

BILL OF INFORMATION FOR THEFT OF GOVERNMENT FUNDS

UNITED STATES OF AMERICA	*	CRIMINAL DOCKET NO.
v.	*	SECTION:
SHANETTE RAQUELL KENNARD	*	VIOLATION: 18 U.S.C. § 641
a/k/a Shanette R. Kennard		

\* \* \*

The United States Attorney charges that:

COUNT 1

A. AT ALL TIMES MATERIAL HEREIN:

1. The defendant, SHANETTE RAQUELL KENNARD, a/k/a Shanette R. Kennard (KENNARD), was a resident living in the Eastern District of Louisiana on or about September 1, 2008.

2. On or about September 1, 2008, Hurricane Gustav caused damage in St. James Parish, State of Louisiana, in the Eastern District of Louisiana resulting in the Federal Emergency Management Agency (FEMA), an agency and department of the United States, providing disaster assistance to those people who were affected by the hurricane. One of the major requirements of receiving disaster

assistance was that Hurricane Gustav must have damaged the defendant's primary residence, where she was living, at the time of the storm.

3. The damaged mobile home located at 9143 Highway 44, Convent, Louisiana was not owned by the defendant, **KENNARD**, until September 29, 2008.

4. No utilities were connected to the mobile home located at 9143 Highway 44, Convent, Louisiana on September 1, 2008.

**B. THE OFFENSE:**

From on or about September 24, 2008, to on or about October 6, 2008, in the Eastern District of Louisiana and elsewhere, the defendant, **SHANETTE RAQUELL KENNARD**, a/k/a Shanette R. Kennard, did knowingly steal, purloin, and convert to her own use, money of the Federal Emergency Management Agency, a department and agency of the United States, to which she knew she was not entitled, having a value of \$28,800; all in violation of Title 18, United States Code, Section 641.

**NOTICE OF FORFEITURE**

1. The allegations in this Bill of Information are re-alleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 641, and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

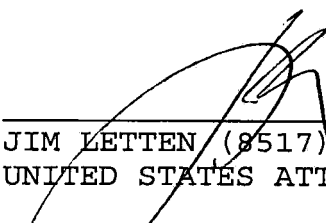
2. As a result of the offense alleged herein, the defendant, **SHANETTE RAQUELL KENNARD, a/k/a Shanette R. Kennard**, shall forfeit to the United States pursuant to Title 18, United States Code, Sections 641, and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461, any and all property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Section 641.

3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of Forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

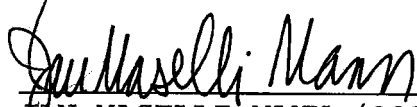
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Sections 641, and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461.



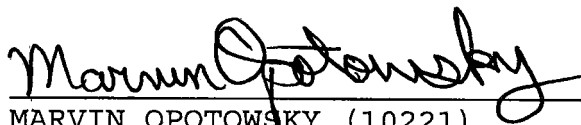
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JIM LETTEN (8517)  
UNITED STATES ATTORNEY



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JAN MASELLI MANN (9020)  
First Assistant United States Attorney  
Chief Criminal Division



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MARVIN OPOTOWSKY (10221)  
Assistant United States Attorney

New Orleans, Louisiana  
March , 2012